

Proposed Testing Outline for Norlite Kiln 1

Norlite has submitted a 40 CFR 63.7(h) waiver request that shows compliance with the emission standards of 40 CFR 63 Subpart EEE for both Kiln 1 and Kiln 2 by a significant margin of compliance. EPA has reviewed the waiver request and finds that three (3) pollutants were over 50% of the regulatory emission rates for the most recent CPT of Kiln 2. Although DEC and EPA both used a 25% margin of compliance in reviewing prior test protocols, EPA has now stated that the appropriate margin of compliance is 50% and, as a result, additional testing is required. Based on discussions between Norlite and EPA and in order to address EPA's concerns, Norlite proposes that the following testing be conducted in the second quarter of 2017. In submitting this proposal, Norlite reaffirms that its CPT test protocol was properly reviewed, published and approved in accordance with the CAA and that those test results are now incorporated into its Title V program and, as a result, any program of testing also requires the agreement of NYSDEC (the delegated agency responsible to approve the CPT test protocol).

PCDD/PCDF

Norlite will test Kiln 1 and Kiln 2 as early as April 1, 2017 for PCDD/PCDF. The testing will satisfy the requirement to do confirmatory testing for PCDD/PCDF that is due May 2018. The testing on Kiln 1 will be three (3) 3-hour runs over two days while running shale feed, hazardous waste feed and backend temperatures close as possible to the OPLs established in the 2015 CPT Report and NOC. The testing on Kiln 2 will be three 3-hour runs over two different days while running under normal daily operation. More details will be provided in the formal Confirmatory Test Plan.

HCl/Cl₂ and Mercury

Norlite will perform emission testing for HCl/Cl₂, particulate matter (PM) and mercury on Kiln 1 after the Confirmatory Test discussed above. Although PM was not above the 50% threshold, it will also be tested in this campaign because the samples are taken with the same sampling train as the HCl/Cl₂. The OPLs will closely match those established in the 2015 CPT Report and NOC except for stack gas flowrate and venturi pressure drop. Since the flow rate and pressure drop are inextricably related to each other, these parameters will be set in the middle of the defined operating range from the 2015 CPT. The stack gas flowrate for Condition 2 was 33,103 scfm and the stack gas flowrate for Condition 3 was 25,490 scfm. As such, the stack gas flowrate will be set as close to 29,300 scfm as possible. Since the venturi pressure drop is a function of the stack gas flow, it should fall around 4.5 in w.c.. This approach assumes that EPA and Norlite can come to an agreement regarding the difference between a normal operating window versus different modes of operation and how to define them.

Post Testing Operation

The purpose of these tests is to demonstrate compliance with emission standards on Kiln 1 and it is fully expected that the emissions measured during these campaigns will be in full compliance with the regulations. While every effort will be made to match OPLs from the planned tests to those established during the 2015 CPT, none of the operational data collected from the planned tests will be used to modify the OPLs established in the 2015 CPT Report and NOC.

By conducting the emission testing as outlined above and demonstrating compliance with the Subpart EEE emission standards, Norlite will not be required to perform a CPT on Kiln 1 until the next scheduled test under 40 CFR Part 63, subpart E. In addition, it is also understood Norlite's emissions testing will satisfy EPA concerns regarding the requirement for a CPT on Kiln 1 and Norlite's obligations under the EPA Administrative Order. If EPA does not agree that conducting a successful stack test as outlined above eliminates the need for Norlite to conduct a CPT on Kiln 1, Norlite's stack testing proposal is withdrawn and additional negotiations with EPA will be necessary to resolve the issues raised by the EPA Administrative Order.